

Hawkins, CherylA

From: Teichman, Kevin
Sent: Tuesday, September 05, 2017 4:07 PM
To: Hawkins, CherylA
Cc: Otto, Martha
Subject: Fw: Regarding your allegation of a loss of scientific integrity

FYI.

Kevin Teichman
Senior Science Advisor
Office of Research and Development (8101R)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Phone: (301) 975-6421
Fax: (301) 975-4409

From: Otto, Martha on behalf of Scientific Integrity
Sent: Tuesday, September 5, 2017 3:43 PM
To: (b) (6)
Cc: Teichman, Kevin
Subject: Regarding your allegation of a loss of scientific integrity

Sent on Behalf of Kevin Teichman, Ph.D., U.S. EPA's Scientific Integrity Program

Dear (b) (6)

This is in response to your allegation of a loss of scientific integrity concerning (b) (6)
(b) (6)

The U.S. Environmental Protection Agency (EPA) is dedicated to preserving the integrity of the scientific and scholarly activities it conducts and that are conducted on its behalf. The EPA Scientific Integrity Policy, dated February 2012, provides principles and standards to ensure scientific integrity in the conduct, use, and communication of science (see <https://www.epa.gov/risk/policy-epa-scientific-integrity>). When this policy is not adhered to, or is circumvented, the robustness of EPA science and the trust in the results of our scientific work can be impacted, causing a loss of scientific integrity. Loss of scientific integrity is the result of a deliberate action by an employee that compromises the conduct, production, or use of scientific and scholarly activities and assessments. EPA strives to prevent loss of integrity in the performance of its scientific and scholarly activities and in the application of science in its decision making.

We consider three criteria when establishing a loss of scientific integrity:

- 1) There is a significant departure from accepted practices of the relevant scientific or scholarly community;
- 2) The actions causing the loss of integrity are committed intentionally, knowingly, or recklessly; and
- 3) The allegation is proven by a preponderance of evidence.

A Scientific Integrity Review Panel ("Panel") comprised of four Deputy Scientific Integrity Officials was convened to review the relevant information related to your allegation.

You alleged that the practice of (b) (6) (b) (6) (b) (6) is fundamentally statistically flawed. You also said that, since the 1970s, practitioners worldwide have largely uncritically (b) (6), dividing the (b) (6) by the (b) (6) (b) (6)

You also said that (b) (6) data have been widely used by EPA and others in developing ecological effects test guidelines for (b) (6) and (b) (6) sampling and analysis; determining (b) (6) factors; modeling (b) (6) such as in (b) (6) quality criteria; used in the (b) (6) approach; and developing guidelines and assessing trends in human exposure to (b) (6) among others.

You said that (b) (6) is only statistically correct if the relationship between (b) (6) (b) (6)

Analysis

EPA's Scientific Integrity staff conducted initial research and then worked with EPA's Office of General Counsel's Conflict Prevention and Resolution Center to evaluate your allegation under its Alternative Dispute Resolution program.

Scientific Integrity staff and the contractors identified and interviewed individuals who are knowledgeable about or directly involved with the conduct of EPA (and/or other Federal agencies) (b) (6) protocols.

Finding

The evaluation by the Scientific Integrity Review Panel found that the appropriateness of (b) (6) depends on the intended application and is an ongoing issue of scientific debate and advancement. The Panel also recognized that you and other scientists have raised concerns about the limitations and complexities of (b) (6) data. In the end, the Panel concluded that the information that you provided did not support a claim of a loss of scientific integrity.

Sincerely,

Kevin Teichman

Kevin Teichman, Ph.D.
Senior Science Advisor
Office of Research and Development (8101R)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460